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February 25, 2022

**VIA ECF**

Honorable Alison J. Nathan  
United States District Court Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

Re: Luis Jaime v. Captain Kirkland et al., 20-CV-4365 (AJN) (DCF)

Your Honor:

I am a Senior Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, representing defendants Captain Kirkland, Captain Morales, Captain Phillips, and Chief Jennings. Per the Court's January 12, 2022 order, discovery in this matter closed on February 16, 2022. Defendants intend to file a motion for summary judgment, which, per Your Honor's Individual Rules, would be due on March 18, 2022. In light of other case commitments, defendants write respectfully to request a forty-five day extension of time to file their motion for summary judgment, which would presently be due on March 18, 2022, to May 2, 2022, with a corresponding extension of time for plaintiff's opposition to May 16, 2022, and defendants' reply to May 23, 2022. This is the first such request, to which plaintiff consents.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch  
Senior Counsel

cc: **VIA ECF**  
Samuel DePaola, Esq.  
Sim & DePaola, LLP  
Attorney for Plaintiff

